## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 4:14C00090 NAB
	)	
V.	j	
	j	
NINE THOUSAND, TWO HUNDRED	j	
FORTY-TWO DOLLARS AND	j	
SEVENTY-CENTS (9,242.75)	j	
U.S. CURRENCY, ET AL.	j	
	-	

## SECOND OBJECTION TO GOVERNMENT'S SECOND MOTION TO EXTEND TIME TO FILE COMPLAINT FOR FORFEITURE

<u>Comes now the claimant, Pamela Tabatt, et al, and in support of their objection to the government's Second Motion To Extend Time To File Complaint For Forfeiture states as follows:</u>

- 1. Claimant's property and U.S. Currency was seized on September 25, 2013 by agents of the United States Government.
- 2. The law states that not later than 90 days after a claim to the seized property has been filed that the government SHALL file a complaint for forfeiture.
- 3. The claimant's made a claim objecting to the government's seizure of their property in November of 2013, approximately 60 days after the seizure.
- 4. This Court previously granted an extension to the government.
- 5. No criminal charges have been filed, to date, relative to the seizure of the claimant's property.
- 6. The claimant is an American Citizen who has been aggrieved by the Government by the Governments seizure of her lawful property.

- 7. The claimant's business has already suffered a tremendous hardship as a result of the Government's seizure of their property.
- 8. The claimant's have suffered tremendous personal hardship as a result of the Government's seizure of her property.
- 9. The government alleges no legitimate reason for any further extension in this matter.

WHEREFORE, the claimant's object to any further extension for the Government to file its complaint for forfeiture. The claimants request an order directing the government to return the claimants property. The claimants request the right to be heard on its objection, and for any further relief the Court deems appropriate in the circumstances.

Respectfully Submitted,

/s/ Kenneth Rader Schwartz
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